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Croatia

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Food and Agricultural Import Regulations and Standards--Country Report

2004

Approved by:

Sarah Hanson
U.S. Embassy

Prepared by:

Andreja Misir

Report Highlights:

This report provides information on the food import rules for Croatia. It includes information on labeling, packaging, food additives, and import procedures. Important points of contact for U.S. food exporters are listed in the appendices.

Includes PSD Changes: No
Includes Trade Matrix: No
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Disclaimer: This report has been prepared by the Office of Agricultural Affairs of the USDA/FAS (in Vienna, Austria) for U.S. exporters of domestic food and agricultural products. While every possible care has been taken in the preparation of this report, information provided may not be completely accurate either because policies have changed since its preparation, or because clear and consistent information about these policies was not available. It is highly recommended that U.S. exporters verify the full set of import requirements with their foreign customers, who are normally best equipped to research such matters with local authorities, before any goods are shipped. FINAL IMPORT APPROVAL OF ANY PRODUCT IS SUBJECT TO THE IMPORTING COUNTRY'S RULES AND REGULATIONS AS INTERPRETED BY BORDER OFFICIALS AT THE TIME OF PRODUCT ENTRY.

I. FOOD LAWS DEALING WITH IMPORTS

Croatian food legislation consists of the following types of laws:

- the food law (see translation of the food law HR3023)
- regulations under the law on health standards, health control over food products and objects of general use
- the law on norms and regulations;
- the law on cattle-breeding and regulations;
- the veterinary law and regulations;
- old regulations that Croatia adopted from former Yugoslavia

Croatian food laws and regulations are valid both for domestic and imported products and border inspectors are regular and consistent. Since the food law was published, Croatia is putting a lot of effort to harmonize its food legislative with E.U. food and labeling legislation.

A. Scope of laws and regulations:

1. The food law (Governmental Gazette NN117/2003, NN48/2004) and regulations

- regulation on health standards of objects that are in contact with food NN46/2004,
- regulation on food for special nutritional purposes NN80/2004
- regulation on quality standards of cattle carcasses on slaughtering line NN20/2004
- ordinance on levels of genetically modified organisms (GMO) in products under which products that are placed on the market don't have to be labeled as containing GMO (with list of GMOs that can be in a product as technological trace) NN 34/2004
- all the regulations are still not issued so old regulations mentioned later in the text are still valid

This law regulates:

- general principles and requirements relating to the hygiene and sanitary safety of food and feed,
- the obligations of food business operators and feed business operators regarding the hygiene and sanitary safety of food, including feed,
- general requirements relating to food
- general requirements for obtaining the registration of geographical indications and designation of origin or the food and the traditional reputation of the food,
- general requirements relating to the declaration and labeling of food and feed,
- general requirements for placing food and feed on the market,
- general requirements for placing novel foods on the market,
- general requirements for placing on the market food and feed which contains genetically modified organisms or consists of them,
- the system of official control of food and feed,
- the system of authorized testing laboratories and reference laboratories,
- crisis and emergency management,

- foundation of the Croatian Food Agency,
- authority and responsibilities of the competent authorities regarding food and feed produced in the Republic of Croatia or imported and placed on the market of the Republic of Croatia.
- This law applies to all stages of production, processing, storage and distribution of food and feed, except for primary production, preparation, handling and storage of food in households intended for personal consumption and feeding of household animals that are not intended for sale on the market.

2. The law on health standards, health control over food products and objects of general use (Governmental Gazette #1 from 1997 or NN 1/1997). Since the food law was published articles on foodstuff and objects of general use that are in direct contact with food aren't valid any more, but some of the derived regulations are still valid until the food law regulations get published.

- regulation on additives that can be found in food products NN 130/1998, NN122/2000, NN129/2003;
- regulation on quantity of pesticides, toxins, mikotoxins, metals, histamines and similar substances which can be found in food products; and other conditions connected to health standards of food products, and objects of general use NN46/1994, NN45/1998;
- regulation on conditions of preservation of food products and objects of general use with ionization radiation NN46/1994;
- regulation on microbiological standards for food products NN46/1994, NN20/2001, NN40/2001, NN125/2003, NN32/2004;
- ...

3. The law on norms (NN55/1996) and derived regulations - the new law on norms was published (NN 163/2003) and will be valid from January 2005 when articles 2,9,10,11 and 12 from the old law on norms (NN55/1996) will stop being valid, regulations derived from law on norms (relevant for this report) will be valid until regulations that should be issued under the food law come into effect:

- regulation on basic requirements for beverages and mineral water NN23/1997;
- regulation on basic requirements for coco products, chocolate products, creme products and bonbons NN90/1996;
- regulation on basic requirements for edible oil, margarines, and similar products, mayonnaise, dips, salads, and other products on basis of oil and fat NN39/1999;
- regulation on basic requirements for beer and products similar to beer NN6/1998;
- regulation on basic requirements for salt for human consumption NN15/1997;
- regulation on basic requirements for natural mineral, spring and table waters NN58/1998;
- regulation on basic requirements for olive oil NN35/1999;
- regulation on basic requirements on snack products NN52/1997

The function of this law is to protect consumers; develop the Croatian market; simplify international trade; protect the environment, human and animal health and harmonize products. The law gives general labeling rules and derived regulations prescribe specific labeling of food products. Regulations under this law proscribe quality standards that food products must have and analytical methods of quality product control.

4. The law on cattle-breeding (NN 70/1997 NN 36/1998, NN76/1999, NN151/2003) and derived regulations and ordinances - regulations derived from the law on cattle breeding (relevant for this report) will be valid until regulations that should be issued under the food law don't replace them:

- regulation on quality of honey and other bee products NN 20/2000;
- regulation on feed NN 26/1998;
- regulation on quality standards of cattle carcasses on slaughtering line NN20/2004

Among other things this law regulates trade with animals, the quality of animal feed and animal products, for example, honey and honey products quality standards and labeling.

5. The veterinary law (NN 70/1997, NN105/2001, NN172/2003) and derived regulations (relevant for this report) that will be valid until regulations that should be issued under the food law don't replace them:

- regulation on shipment of products of animal origin for which there are no veterinarian or health issues when imported or transshipped thru Republic of Croatia NN98/1993, NN159/1998, NN 1/2001;
- ban of use of certain veterinarian medicines on animals whose meat and products are used for food NN 4/2002;

This law deals with vet-health control for aforementioned products and required accompanying documents, regulates import, export and transit of shipments with animals, animal products, animal semen, feed, veterinarian drugs and other products for animals.

6. Regulations from former Yugoslavia that are still valid until the ones proscribed with the food law are not published regulate quality standards of certain food products:

- quality of alcoholic and non alcoholic drinks, ice and vinegar Sl. List SFRJ 13/1957, 53/1978, 58/1978, 2/1982, 34/1982, 52/1983, 58/1983, 16/1988, 24/1989;
- quality of coffee and coffee surrogates, tea, condiments, baking powder, concentrate for backing, concentrate for pudding, dietetic products and additives Sl. List SFRJ 20/1980, 41/1980, 45/1981, 5/1986, 33/1989, 39/1989,
- quality of cookies and similar products and there are 21 more regulations and many more amendments.

B. Overview of legislation on specific product and issues:

1. Honey

- - quality standards of honey and honey products (bee products), plus conditions under which product must comply with labeling, and quality control can be found in NN 20/2000

2. Dietetic foods

- regulation on health standards of objects that are in contact with food can be found in NN46/2004

3. Wine legislation

- wine law (NN96/2003)

4. Hygiene Regulations

- food law (NN117/2003, NN48/2004) covers this subject,
- regulation on health standards of objects that are in contact with food (NN46/2004) covers this subject,

- veterinary law (NN 70/1997, NN105/2001, NN172/2003), that deals with animal breeding and slaughtering houses hygiene, also cover this subject.

5. Pesticides, Heavy Metals and Mycotoxines

-- Regulation on quantity of pesticides, toxins, mycotoxines, metals, histamines and similar substances which can be found in food products, and other conditions connected to health standards of food products and objects of general use (NN 46/1994, NN45/1998) deals with this issue.

6. Packaging Regulations

- Regulation on measuring demands for packaging (NN23/1997, NN29/1997, NN93/1997, NN159/1998, NN77/2001, NN22/2002, NN77/2003) regulates the volume indicated on the label, acceptable tolerances, and test procedures for packaging.

- The law on waste (NN 151/2003) and regulation on managing container waste (NN 53/1996) regulates disposal of container waste and packaging material.

7. Custom matters are regulated by:

The law on custom (NN 78/1999, NN94/1999, NN179/1999, NN73/2000, NN92/2001, NN47/2003), ordinance for applying the law on customs (161/2003) and regulations dealing with custom documents and fees. They can all be found at www.carina.hr together with all needed documents. Mentioned web page is in Croatian but soon it will be available in English.

II. LABELING REQUIREMENTS

(Nutritional Labeling, Biotechnology Labeling, Health Claims, Organic Labeling)

A. General requirements

The food law (NN 117/2003, NN48/2004) gives general rules on product labeling and minimum requirements for the label. Regulations on specific products (see section IA) give specific and detailed guidance on what data label must contain until all new regulations that will be issued under food law will be enacted.

According to the food law:

The food that is placed on the market of the Republic of Croatia must have a declaration. The declaration shall include all written indications, a market indication, trade mark, brand name, picture or symbol referring to the food and is placed on the packaging, a sticker or tag should be placed on the documents and all notifications that accompany or refer to that food.

The declaration must contain the following information:

- the name of the food under which it is sold;
- the list of ingredients;
- the quantity of specific ingredients or the category of the ingredients;
- the net quality for the packaged food;
- the expiry date;
- storage conditions, where necessary, whether they can influence on the duration of the food, respectively;

- the name and address of the producer or the person who packages the food and/or places it on the market;
- for imported products, one must put next to the name and address of the producer, the name and address of the importer's head office and the country of origin;
- the details about the place of origin if the absence of this information could be misleading for the consumer about the true origins of the food;
- instructions and usage where necessary for proper handling;
- for beverages containing more than 1,2% vol. of alcohol, and the true strength of the alcohol by the volume.

The Declaration or Labelling of Novel Foods

Novel foods placed on the market of the Republic of Croatia, apart from the general declaration or indication requirements must also contain on the declaration additional special information to keep the consumers informed about all the characteristics and features by which the novel food or its ingredient no longer corresponds to the existing food or food ingredient. In that case the declaration must contain information about the changed characteristics or features including the method used to get that indication or characteristic. The food and food ingredients containing or consisting of GMOs, must have a visible indication that it contains or consists of GMOs including the term GMO. The indication must clearly state "genetically modified organisms" or contain the sentence "This product contains genetically modified organisms." The food and food ingredients originating from GMOs but not containing them must have a visible indication that they originate from GMOs. The requirements regarding the declaration of novel food shall be provided some time in the future by an enforced regulation by the Minister of Health in accordance with the Minister of Agriculture and Forestry.

In addition, regulations for specific products (see IA) require following:

name of the product and name under which product is sold
company, that is, name and address of the producer - for imported products
address of importer
net weight of the product in metric units
basic compounds,
additives (type, name and E number) listed in decreasing order
date of production and expiry date
(different regulations require different ways of writing this data, that is, everything in numbers, month with letters, year stated only with last two digits, etc.)
storage instructions
other information important to the consumer can be added

2. All labels must be in the Croatian using a Latin alphabet, must be visible, legible and understandable.

3. Products are not allowed entry with only a standard US label only; it must have Croatian label. In some special cases products may be imported without a Croatian label but the product can not be sold until trade inspection ensures that Croatian labels were attached to the products.

4. Stick-on labels, meeting local requirements, can be affixed in addition to the standard U.S. label.

5. Imports cannot enter the country with foreign labels.

6. Food samples do not have to be labeled.
7. We are not aware of products sold with U.S. standard labeling.
8. There are no special shelf - life or country - of - origin requirements.
9. Croatian authorities do not grant exception to their labeling regulations.

B. Nutritional Labeling Requirements

-- the food law (NN117/2003, NN48/2004) proscribes general rules on labeling

-- regulation on food for special nutritional purposes (NN80/2004) covers nutritional labeling for baby food, food without gluten, kitchen salt replacements, food for special medical purposes, diet food for weight reduction, food for diabetics, food with small and/or decreased and/or changed nutrition value, food with bigger content and/or enriched with nutritional content, food with increased or decreased energy level and food supplements.

1. Nutritional labeling is mandatory.
2. Claims such as light, reduced, etc. are permitted on the package (not on the label) as long it is truthfully proven. Products are checked in laboratories on chemical content.
3. Implied claims such as "you would not believe that something so light could taste so good" are not forbidden by law but are not recommended.
4. Not all food can be attributed the characteristics of preventing, healing or recovering from diseases or refer to such characteristics through declaration and methods of declaring.

Health claims are not desired.

III. PACKAGING AND CONTAINER REGULATIONS

A. Package size for food products is determined by regulation on measuring requirements or packaging (NN23/1997, NN29/1997, NN93/1997, NN159/1998, NN77/2001, NN22/2002, NN77/2003). This regulation prescribes for every package nominal fillings, marking of the quantities, etc.

B. Companies or persons that put food in packages are obligated to collect used packaging, according to the regulation on managing container waste (NN 53/1996). The only collecting organization for that purposes is operating in Zagreb and can be hired to do the same job in any part of Croatia. In other towns the regulation is not followed and Ministry of Environment is trying to prosecute big companies because of bad waste management, but these cases are still waiting in the courts.

C. Limitations for each type of packaging material are prescribed by the regulation on health standards of objects that are in contact with food (NN46/1994). That regulation proscribes in details what certain packaging material can consist of. The main request is that packaging material is not negatively impacting organoleptic, chemical or physical characteristic of food and can not consist or release compounds that could be harmful to human health.

IV. FOOD ADDITIVE REGULATIONS

A. Additives are regulated by regulation on additives that can be found in food products (NN 130/1998, NN 122/2000, NN129/2003) this includes: use of colors, preservatives, antioxidants, emulators, stabilizers, gel makers, ph controllers, taste increasers, flower treatment, aromatizing, enzymes, and other.

Regulatory authorities do not accept the list of CODEX approved food additives for imported foodstuffs. Importers usually select products that comply with the Croatian list or ensure that the producer's products are in compliance with Croatian additives list.

B. Regulatory authorities developed a positive additive list. The list can be obtained on governmental gazette web page: www.nn.hr but there is no English version of the list.

V. PESTICIDE AND OTHER CONTAMINANTS

A. The maximum content of certain pesticide or residues in foodstuffs is governed by the regulation on quantity of pesticides, toxins, mikotoxins, metals, histamines and similar substances which can be found in food products and other conditions connected to health standards of food products and objects of general use (NN 46/1994, NN45/1998). Pesticides are listed alphabetically with corresponding maximum content for certain foods. This regulation is enforced by municipal and customs sanitary and veterinary inspection.

B. The pesticide residue list is positive, i.e., stating what is permitted, versus, what is not permitted.

C. According to plant protection law (NN 10/1994, NN117/2003), all pesticides must be registered. The registration office is as follows:

Zavod za zastitu bilja
Svetisimunska c. 25
10 000 Zagreb
tell./fax 00385-1-23 11 640

VI. OTHER REGULATIONS AND REQUIREMENTS

A. Food products do not have to be registered for import in Croatia, but they have to comply with food-quality standards prescribed with Croatian laws and regulations.

B. All shipments that contain food will go to sanitary inspection, that is, they will be randomly tested for quality, health standards and GMO content.

C. Product samples shipped via express mail and food for fairs are treated like any other import, so they will be tested for quality, health standards and GMO content.

D. At the retail and wholesale level, food storage and foods are inspected on a basis of the plan for that year or if an event requires it.

E. Upon the import of food, which according to the regulations on food shall be required to have an obligatory certificate on sanitary safety, the consignments must contain a regulated international certificate on the sanitary safety of the consignment, if it has not been determined otherwise by an international convention. For the food being imported, international certificates on the sanitary safety of the consignment can be recognised based on bilateral and multilateral conventions, issued by the competent authority of the exporting country. If the conventions from are non-existent, the recognition of international certificates and other documents shall be carried out through enforced regulations.

Inspectors have right to ask for GMO free certificate, additional information from producer or certificates from competent institutions of country of export, for example, producers specification, certificate of origin, certificate of compliance with certain regulation, etc.

VII. OTHER SPECIFIC STANDARDS

- A. Consumers Packaging or municipal waste disposal, see section III, item 2.
- B. Only metric weights and measures are accepted.
- C. Fortification on foods with vitamins and minerals is permitted. In this case labeling should be carried out according to the regulation on food for special nutritional purposes (NN80/2004).
- D. Genetically modified organisms (GMO) and food produced from them are regulated by the food law (translation of the food law HR3023) and ordinance on levels of GMO in products under which products that are placed on the market don't have to be labeled as containing GMO (with list of GMO that can be in a product as technological trace) NN 34/2004. For details see BK 4015, HR 4006, HR 3019.
- E. Dietetic or special use foods fall under regulation on food for special nutritional purposes (NN80/2004), see section II B.
- F. Food sanitation: Allowed chemical preservatives are listed in regulation on additives that can be found in food products (NN 130/1998, NN122/2000, NN129/2003). Certain food can be preserved with ionizing radiation according to regulation from NN 46/1994.
- G. Marine products: regulation about quality of fish, crabs, sea-urchin, shells, frogs, snails, turtles, and their products, from ex Yugoslavia governmental gazette sl. List SFRJ, num. 46/91.
- H. Animal quarantine: For live animals import, animals should pass quarantine.
- I. Wine is regulated by law on wine (NN96/2003)
- J. Organic products:

Regulation on labeling organic products (NN 13/2002)
Label must contain:
name of the product,
date of production,
name and address of producer or importer and number from the list of the producers of eco agricultural and food products,

country of origin,
list of compounds in decreasing order,
net weight,
the word: "eco" product (ekoproizvod),
name of inspection service,
unique number of acknowledgment,
other data in compliance with special regulations.
- K. Product samples and mail order shipments are treated like any other import.

VIII. COPYRIGHT AND/OR TRADE MARK LAWS

A. Trade marks and brand names are legally protected in Croatia with laws that are in compliance with EU legislative.

B. Companies interested in the registration of trademarks or brand names have to apply at the State Intellectual Property Office (open from 9:00 to 14:00 hours) where all information and application forms are available. If company wants to contact lawyer for assistance first, the State Intellectual Property Office has a list of legal representatives. The address and telephone numbers of State Intellectual Property Office follows:

Drzavni zavod za intelektualno vlasnistvo
Ulica grada Vukovara 78
10 000 Zagreb
Croatia

Switchboard: tell. 00385-1-6106111

IX. IMPORT PROCEDURES

A. Incoming goods go to the custom storage at transport terminals or airports. After goods arrive to the custom storage, importer in person or freight forwarder should start procedures for checking and clearing goods, which includes special documents that should be sent to the Inspection Departments and the Custom. Procedure starts with Sanitary Inspection Department from Ministry of Health which checks all products that are coming in contact with people except meat, which is checked by Veterinary Inspection Department from Ministry of Agriculture. Samples for quality checking are taken every time that import is conducted. If border inspector (sanitary or veterinary) trusts importer, on basis of regular import, than products are inspected only periodically (every three months). Product examination has to be paid by importer. If products are of suspicious quality their sales will be banned until analyses is conducted and proven otherwise. Custom clearance and removal from storage is carried out under the supervision of a custom officer who compares the documents with the commodities after they were checked by sanitary or veterinary inspector for ingredients and quality.

Documents needed for meat import can be found at:
USDA office in Croatia see appendix II

Custom rates and documents for imports can be found at:
<http://www.carina.hr>

(As this web site is in Croatian only for clarification, contact your Croatian partner or one of freight forwarding companies to determine the proper rates.)

B. Custom import documents should be in Croatian, but documents in English language are accepted.

C. Average length of custom clearance for food products, if all documents are in order, is one day.

D. If product is rejected at customs there is a possibility of appeal. Possibility that the product is rejected by importer should be controlled in contract between exporter and importer, and than if the case has a standing point in the contract certain issue can be brought to court, but Croatian legal system is slow and inefficient.

APPENDIX I. GOVERNMENT REGULATORY AGENCY CONTACTS

Control over the products that are regulated by the laws on food, cattle-breeding and veterinary law and regulations (see I a), wine law and regulations (see I b):

Government of Republic of Croatia
Ministry of Agriculture and Forestry
Grada Vukovara 78
10000 Zagreb
tel. 00385(0)1 6106111
fax. 00385 (0)1 6109201
e-mail: office@mps.hr
web page: www.mps.hr

Government of Republic of Croatia
Ministry of Agriculture and Forestry
Grada Vukovara 78
10000 Zagreb
Animal Health Protection and Veterinary Practice Department
tel. 00385(0)1 6106
fax. 00385 (0)1 6109207
e-mail: office@mps.hr
web page: www.mps.hr

Control over the products that are regulated by the food law and law on health standards, health control over food products and objects of general use (NN 1/97) and regulations (see I a):

Government of Republic of Croatia
Ministry of Health
Deputy Minister for Economy
Ksaver 200a
10 000 Zagreb
tel. 00385(0)1 4607555
tel./fax. 00385(0)1 4677091
web page: www.miz.hr

Control over the law on norms and regulations (see I a):

State Office for Standardization and Metrology
Ulica grada Vukovara 78
10 000 Zagreb
PhD. Divjak
tel. 00385 (0)1 6106215
fax. 00385(0)1 6109324
web page: www.dziv.hr

General trade legislation:

Government of Republic of Croatia
Ministry of Economy
Grada Vukovara 78
10000 Zagreb
tel. 00385(0)1 6106111
fax. 00385 (0)1 6109111
e-mail: info@mingo.hr
web page: www.mingo.hr

Control over laws dealing with waste disposal:

Government of Republic of Croatia
Ministry of Environment
Ulica Republike Austrije 20
10 000 Zagreb
tel. 00385(0)1 3782444
web page: www.mzopu.hr

Useful contact for all general advice on food trade in Croatia:

Croatian Chamber of Economy (Commerce)
Agriculture, Food Industry and Forestry Department
Rooseveltovej trg 2
P.O. Box 630
10000 Zagreb
tel. 00385 (0)1 4826066
00385 (0)1 4826068
fax. 00385 (0)1 4561545
e-mail: poljoprivreda@hgk.hr
web page: www.hgk.hr

APPENDIX II. OTHER IMPORT SPECIALIST CONTACTS

State inspection services that have control over food samples and their testing:

Government of Republic of Croatia
Ministry of Agriculture and Forestry
Grada Vukovara 78
10000 Zagreb
Border Veterinary Inspection Department
tel. 00385(0)1 6106663
fax. 00385 (0)1 6109207
e-mail: ivan.susac@mps.hr
web page: www.mps.hr

Government of Republic of Croatia
Ministry of Agriculture and Forestry
Grada Vukovara 78
10000 Zagreb
Veterinary Inspection Department
tel. 00385(0)1 6106660
fax. 00385 (0)1 6109207
e-mail: agaspar@mps.hr
web page: www.mps.hr

Government of Republic of Croatia
Ministry of Health
Sanitary Inspection
Ksaver 200a
10 000 Zagreb
tel. 00385(0)1 4607622
tel./fax. 00385(0)1 467631
web page: www.miz.hr

Government of Republic of Croatia
Ministry of Environment
Ulica Republike Austrije 20
10 000 Zagreb
Environment Protection Department
tel. 00385(0)1 3782444
fax. 00385(0)1 3772822
web page: www.mzopu.hr

Information source for reports on Croatia and other countries is found at:

<http://www.fas.usda.gov/scripts/attacherep/default.asp>

EMBASSY (FAS/USDA) POINT OF CONTACT

For questions regarding other issues not covered in this report, please contact:

Ms. Andreja Misir
American Embassy
Agricultural Section
Thomas Jefferson St. #2
10000 Zagreb
tel. 00385 1 665 8951
mob. 00385 (0)91 4552365
e-mail: amisir@inet.hr